

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

Janice Biagioli,

Plaintiff

v.

Credit Control, LLC,

Defendant

Docket No. 3:21-CV-2008

(JUDGE ROBERT D. MARIANI)

STIPULATION TO EXTEND DEADLINES

1. Currently, the deadline for discovery in this matter is April 28, 2023.
2. The parties have been engaging in discovery, and are preparing to conduct depositions.
3. However, due to scheduling conflicts involving counsel and the parties, it will not be possible for depositions to be completed by the current discovery deadline.
4. Counsel for the parties have conferred in good-faith, and believe that a 60-day extension of time will be sufficient for depositions to be completed.
5. Additionally, the parties believe that the deadline for dispositive motions should likewise be extended.
6. This request is not being made for any improper purpose, and is instead being made due to *bona fide* scheduling conflicts.
7. Thus, the parties request that the Court approve this stipulation and:
 - a. extend the deadline for depositions to June 30, 2023, and
 - b. extend the deadline for dispositive motions to August 31, 2023.

s/ Brett Freeman

Brett Freeman
Bar Number: PA 308834
FREEMAN LAW
210 Montage Mountain Road
Moosic, PA 18512
Attorney for Plaintiff

s/ Brendan Little (with consent)

Brendan Little
Bar Number PA 317322
Lippes Mathias, LLP
50 Fountain Plaza, Suite 1700
Buffalo, NY 14202
Attorney for Defendant

Phone (570) 589-0010
Fax (570) 456-5955
Email: brett@freeman.law

Phone (716) 853-5100
Fax (716) 853-5199
Email: blittle@lippes.com

ORDER

So ordered.

Date: _____

Robert D. Mariani
United States District Judge